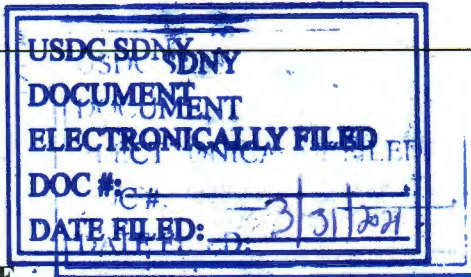




U.S. Department of Justice

United States Attorney
Southern District of New York



The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 30, 2021

3/31/21

BY ECF

The Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Luigi Alexander Hierro-Belen, a/k/a "Menor,"
21 Cr. 161 (CM)

Case Adj to May 19, 2021
At 2pm - time excluded
through May 19, in the
interest of justice, to
facilitate plea discussions.

Dear Chief Judge McMahon:

MEMO ENDORSED

Colleen McMahon

A status conference is scheduled in the above-captioned matter for March 31, 2021. After conferring with the Court's Chambers regarding available dates, the parties respectfully request that the Court adjourn the status conference until May 19, 2021, at 2 p.m. The Government and defense counsel have been engaged in productive discussions regarding possible pretrial resolution. The adjournment is requested to permit parties additional time to complete these discussions and for defense counsel to advise the defendant regarding possible pretrial disposition, which communications are hampered in part by the limitations and restrictions on such communications caused by the COVID-19 pandemic.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from March 31, 2021 until May 19, 2021 for the reasons stated above. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, who consents to the adjournment and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: 
Brett M. Kalikow
Assistant United States Attorney
(212) 637-2220

cc: Jon Silveri, Esq. (via ECF)